## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

DISTRICT OF	SACHUSETTS 259 / FR 12 P 5: 2	
DEBORAH CHIN, On Behalf of Herself	:	Civil Action No. 04-CV-10294-DPW
and All Others Similarly Situated,	:	13 DETERMINE
	:	Hon. Douglas P. Woodlock
Plaintiff,	:	
	:	
v.	:	
	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
7.0	:	
Defendants.	:	
	;	
DIFORMATION DVNIAMICS LLC O-	:	G:-:1 A -4: NT- 04 CN/ 10200 DDN/
INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly	:	Civil Action No. 04-CV-10308-DPW
Situated,		Hon. Douglas P. Woodlock
Situator,		Holl. Douglas F. Woodlock
Plaintiff,	:	
i illilii,		
v.		
SONUS NETWORKS, INC., PAUL R.		
JONES, EDWARD N. HARRIS, J.	:	
MICHAEL O'HARA, HASSAN M.	:	
AHMED and STEPHEN J. NILL,	:	
	: ,	
Defendants.		

AFFIDAVIT OF RICHARD A. SPEIRS IN SUPPORT OF MOTION OF PLAINTIFF SAVERIO PUGLIESE FOR CONSOLIDATION AND FOR APPOINTMENT OF LEAD PLAINTIFF, LEAD COUNSEL AND LIAISON COUNSEL

MICHELLE TREBITSCH, On Behalf of	T:	Civil Action No. 04-CV-10307-DPW
Herself and All Others Similarly	:	
Situated,	:	Hon. Douglas P. Woodlock
D1 : .: 00	:	
Plaintiff,	:	
v.	:	
	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	·
D.C. I.	:	
Defendants.	:	
PETER KALTMAN, Individually and	:	Civil Action No. 04-CV-10309-DPW
On Behalf of All Others Similarly	:	
Situated,	:	Hon. Douglas P. Woodlock
771 : .100	:	
Plaintiff,	:	
v.		
	:	·
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
Defendant.	:	
Defendants.	:	
SAMANTHA DEN, Individually and on	•	Civil Action No. 04-CV-10310-DPW
Behalf of All Others Similarly Situated,		7.
	:	Hon. Douglas P. Woodlock
Plaintiff,	<b>:</b> .	
V.	:	
ν.		
SONUS NETWORKS, INC., HASSAN		
AHMED, and STEPHEN J. NILL,	:	
	:	
Defendants.	;	
	:	

RICHARD CURTIS, on Behalf of	<b> </b> :	Civil Action No. 04-CV-10314-MLW
Himself and All Others Similarly		Civil Action 100, 04-C v-10314-101Lyv
Situated,	:	Hon. Mark L. Wolf
Situation,	:	TION. WALK L. WOI
Plaintiff,		
Fiantiti,	1	
	:	
v.	:	
	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
	:	
	:	
Defendants.	:	
	:	
RONALD KASSOVER, on Behalf of	:	Civil Action No. 04-CV-10329-DPW
Himself and All Others Similarly	1:	
Situated,	1:	Hon. Douglas P. Woodlock
,		Tiom Boughas I. Woodlook
Plaintiff,	:	
r rannar,	•	
	•	
V.		
GOVERNMENT DESCRIPTION OF THE PROPERTY OF THE	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
	;	
Defendants.	:	
STEVE L. BAKER, Individually and on	:	Civil Action No. 04-CV-10333-DPW
Behalf of All Others Similarly Situated,	:	
	<u>:</u>	Hon. Douglas P. Woodlock
Plaintiff,	:	
•	:	
V.		
SONUS NETWORKS, INC., HASSAN	•	
AHMED, and STEPHEN J. NILL,	•	
2 statement, and O first filling. Install,	•	
Daf3	:	
Defendants.	:	
	:	
	:	

MICHAEL KAFFEE, on Behalf of	:	Civil Action No. 04-CV-10345-DPW
Himself and All Others Similarly	:	
Situated,	:	Hon. Douglas P. Woodlock
	:	
Plaintiff,	:	
	:	
V.	:	
COMIC METHODIC DIO HACCAN	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
Defendants.	:	
HAIMING HU, Individually and on	:	Civil Action No. 04-CV-10346-DPW
Behalf of All Others Similarly Situated,	:	
,	:	Hon. Douglas P. Woodlock
Plaintiff,	:	
	:	
v.	:	
	:	
SONUS NETWORKS, INC., HASSAN	<b>:</b>	
AHMED, and STEPHEN J. NILL,	:	
	:	
Defendants.	:	
CUADITE CTADDICE Latinia.	:	C' TAR' NE OF CIT 100 CO DOWN
CHARLES STARBUCK, Individually and on Behalf of All Others Similarly	:	Civil Action No. 04-CV-10362-DPW
Situated,	:	Hon Douglas D. Wondlook
Situatou,	:	Hon. Douglas P. Woodlock
Plaintiff,		
1 1444441115		
v.		
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
	:	
Defendants.	:	
	:	

	- <del>,</del>	
SAMUEL HO, Individually and on	:	Civil Action No. 04-CV-10363-DPW
Behalf of All Others Similarly Situated,	:	
	<u>:</u>	Hon. Douglas P. Woodlock
Plaintiff		11011 Douglas I. Woodlook
1 milling	•	
V.	:	
	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,		
,,	1.	
Defendants.	1:	
Detelluants.	•	
	:	
	:	
JEFFREY C. RODRIGUES, Individually	:	Civil Action No. 04-CV-10364-DPW
and on Behalf of All Others Similarly	1:	
Situated,		Hon. Douglas P. Woodlock
Dituatou,		11011. Douglas 1. Woodlock
Th	:	
Plaintiff,	:	
	:	
v.	:	
SONUS NETWORKS, INC., HASSAN		
	•	
AHMED, and STEPHEN J. NILL,	:	
	:	
Defendants.	:	
	:	
	:	
ROBERT CONTE and MARK		Civil Action No. 04-CV-10382-DPW
RESPLER, On Behalf of Themselves and	•	CIVII ACHOLI NO. 04-C V-10302-DPW
	Ĭ.	TT D 1 D TT 1
all Others Similarly Situated,	:	Hon. Douglas P. Woodlock
	:	
Plaintiff	:	
ĺ	:	
V.	•	
	•	
SONUS NETWORKS, INC., HASSAN	•	
	:	
AHMED, and STEPHEN J. NILL,	:	
	:	
Defendants.	:	Andrea
	.	

WHEATON ELECTRICAL SERVICES	T:	Civil Action No. 04-CV-10383-DPW
RETIREMENT 401K PROFIT	:	
SHARING, On Behalf of Itself and All	:	Hon. Douglas P. Woodlock
Others Similarly Situated,	:	
	:	
Plaintiff,	:	
	:	
v.	1:	
	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
, i	:	
	:	
Defendants.	'	
BRIAN CLARK, On Behalf of Himself	:	Civil Action No. 04-CV-10454-DPW
and All Others Similarly Situated,		TOTOT-DI W
,		Hon. Douglas P. Woodlock
Plaintiff,		LIOM DOUGHUS I. WOUGHOOK
1 100,1111,	:	
v.	:	
	:	
SONUS NETWORKS, INC., PAUL R.		
JONES, EDWARD N. HARRIS, J.	:	
MICHAEL O'HARA, HASSAN M.	:	
AHMED and STEPHEN J. NILL,	-	
2 STATULE and DILLITED J. INILL,	:	
Dofordant	:	
Defendants.		
SHEILA BROWNWELL, On Behalf of	:	Civil Action No. 04-CV-10597-DPW
Herself and All Others Similarly Situated,	:	77
Situatou,	:	Hon. Douglas P. Woodlock
Districe	:	
Plaintiff,	:	·
	:	
V.	:	
CONITCATEGRACORICS	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
	:	
	:	
Defendants.	:	
SAVERIO PUGLIESE, On Behalf of	;	Civil Action No. 04-CV-10612-DPW
Himself and All Others Similarly	:	- · · · · · · · · · · · · · · · · · · ·
Situated,	:	Hon. Douglas P. Woodlock
	:	
Plaintiff,	:	
**************************************		

Defendants.	:	
	:	
AHMED, and STEPHEN J. NILL,	:	
SONUS NETWORKS, INC., HASSAN	:	
	:	
v.	:	
,	:	
Plaintiff,		
Situation,		Tion. Douglas F. Woodlock
Situated,		Hon. Douglas P. Woodlock
Himself and All Others Similarly		CIVII ACUOII NO. 04-CV-10623-DPW
DAVID V. NOCITO, On Behalf of	:	Civil Action No. 04-CV-10623-DPW
Defendants.	:	
	:	
AHMED, and STEPHEN J. NILL,	:	
SONUS NETWORKS, INC., HASSAN	*	
	:	:
v.	:	
	Τ.	

STATE OF NEW YORK	)
	) ss
COUNTY OF NEW YORK	)

I, Richard A. Speirs, being duly sworn, depose and say:

- 1. I am a member of the firm of Zwerling, Schachter & Zwerling, LLP (the "Zwerling Firm"), one of the attorneys for Saverio Pugliese. I am fully familiar with all the facts and circumstances herein.
- 2. This affidavit is submitted in support of the motion of Saverio Pugliese pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, and Section 21(a)(3)(B) of the Securities Exchange Act of 1934 as amended by the Private Securities Litigation Reform Act of 1995, for consolidation and for appointment of Lead Plaintiff, Lead Counsel and Liaison Counsel in the above-captioned actions.

- 3. Attached hereto as Exhibit A is a true and correct copy of the complaint filed in the action Pugliese, et al. v. Somus Networks, Inc., et al., No. 04-CV-10612-DPW (filed March 30, 2004).
- Attached hereto as Exhibit B is the Certification of Saverio Pugliese in Support of Motion for Consolidation and for Appointment of Lead Plaintiff, Lead Counsel and Liaison Counsel.
- Attached hereto as Exhibit C is a true and correct copy of the first notice 5.. of a class action relating to Sonus Networks, Inc. ("Sonus"), dated February 12, 2004, issued by Cauley Geller Bowman & Rudman, LLP.
- Attached hercto as Exhibit D is a firm resume of the Zwerling Firm, Pugliese's choice for Lead Counsel.
- Attached hereto as Exhibit E is a firm resume of Berman DeValerio Pease Tabacco Burt & Pucillo, Pugliese's choice for Liaison Counsel.

Richard A. Speirs

Sworn to before me this day of April, 2004

Public, State Of New York No.015C6067635 Qualified in Queens County Commission Expires Fab. 18, 2007